

Christina-Kamalam of the Dawson-family,
Alex-Singarayan of the Royappa-family,
Daniel-Andrew of the Royappa-family
c/o 1693 South Mary Avenue
Sunnyvale, California [94087]

Defendants, self-standing, by special visitation.

We do not waive any rights,
remedies, or defenses, which are
statutory or procedural.

United States District Court
For the Northern District of California

MOU UN WONG,
Plaintiff,
vs.

Christina-Kamalam of the Dawson-family,
Alex-Singarayan of the Royappa-family,
Daniel-Andrew of the Royappa-family,
(being sued as CHRISTINA K. DAWSON
a.k.a. CHRISTINA DAWSON, ALEX
ROYAPPA, DANIEL ROYAPPA, AMOL
SINHA, Does 1 through 5, inclusive.)

Defendants,

Case Number:

C 21 01006

Case Number: 20-CV-371561

Notice of the Moving and Removal of the
Above-Entitled State Case to the United States
District Court for the Northern District of
California.

Claim for a Jury Trial

Notice of Removal

For the State Case Plaintiff MOU UN WONG, its attorneys, assignees and/or successors, and all
interested parties.

Come Now, Defendant Christina-Kamalam of the Dawson-family, Alex-Singarayan of the
Royappa-family, Daniel-Andrew of the Royappa-family, and hereby respectfully move to

RECEIVED

FEB 09 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

#5
NP

NC

1 remove this case to the United States District Court for the Northern District of California.

2 Hereinafter, Christina-Kamalam, Alex-Singarayan, Daniel-Andrew.

3 Removal is requested pursuant to the jurisdiction placed on the Federal Courts by 28 USC, 1446,
4 and its following codes.

5 The removed case is a civil action filed in the state Court of California, for the Santa Clara Civil
6 Division captioned Plaintiff MOU UN WONG vs. Defendants Christina-Kamalam of the
7 Dawson-family, Alex-Singarayan of the Royappa-family, Daniel-Andrew of the Royappa-
8 family, (being sued as CHRISTINA K. DAWSON a.k.a. CHRISTINA DAWSON, ALEX
9 ROYAPPA, DANIEL ROYAPPA, AMOL SINHA, Does 1 through 5, inclusive.

10 As required by 28 USC Section 1446(a) and Local Rules, copies of all process pleadings. Orders
11 and other papers of exhibits filed in the State Court with attached Exhibits, have been served on
12 the Plaintiffs timely.

13 Venue of this removal is correct under 28 USC Sections 1441(a) in the Northern District of
14 California, because of the State Court for Contra Costa cannot have jurisdiction pursuant to
15 matters with the following matters:

- 16 1. Section 1331, a Federal Question; or,
- 17 2. Section 1332, diversity.
- 18 3. Section 1333, admiralty, maritime and prize cases.
- 19 4. Any of the other areas over which federal courts have original jurisdiction determining
20 what constitutes a federal question.
- 21 5. The non-registration-as-a-foreign-agent of the MOU UN WONG's purported attorneys,
22 22 U.S.C. Section 611 and its following codes, hereinafter F.A.R.A..
- 23 6. The violations of the IRS Code Section 1691 and other IRS codes by the MOU UN
24 WONG purported attorneys.
- 25 7. The claim exceeds \$75,000.00.
- 26 8. The violations of the IRS Code Section 1691 and other codes by MOU UN WONG's
27 purported attorneys.
- 28 9. Implied Duty of Good Faith and Fair Dealing case law, Metcalf, 742 F.3d at 993, and
codes and other case laws.

10. Title 42: USC Section 1986: Knowledge & Stop-Correct-Wrongs
11. FRCP Section 9B: Fraud by a Confession
12. FRCP Section 26E: Closure
13. Title 18: USC Section 4001 & Section 4002: Fictional Communications
14. Title 15: USC Section 1692E: Fraud and Misleading Statements
15. Title 15: USC Section 78ff: Penalty: \$25 Million
16. Title 42: USC Section 1985-1: Conspiracy-Civil
17. Title 42: USC Section 1985-2: Obstruction-Evidence & Witness
18. Title 42: USC Section 1985-3: Depriving-Evidence & Witness
19. Title 18: USC Section 1961: R.I.C.O.
20. Title 18: USC Section 242: Coloring of the Laws, Ailing
21. Title 18: USC Section 241: Criminal-Conspiracy, Tort
22. Title 18: USC Section 3: Criminal-Participation-Knowledge
23. Title 42: USC Section 1983: Personal Damages
24. Title 18: USC Section 1512: Obstruction of the Law
25. MOU UN WONG's purported attorneys violated Christina-Kamalam, Alex-Singarayan, Daniel-Andrew's rights under the color of law, 18 U.S.C. Section 242; 18 U.S.C. Section 245; and 42 U.S.C. Section 1983, by seriously violating the federal F.D.C.P.A. by bullying and making false accusations of one of our witnesses.
26. The Santa Clara County Superior Court violated Christina-Kamalam, Alex-Singarayan, Daniel-Andrew rights under the color of law, 18 U.S.C. Section 242; 18 U.S.C. Section 245; and 42 U.S.C. Section 1983. One of the Defendants' witnesses was bullied and threatened with being arrested by the commissioner and the deputy sheriff. If this case is remanded, there is no state court in which to remand.

The Court has historically interpreted the **arising under** language in Article III very expansively. In *Osborn v. Bank of the United States*, Section 22 U.S. [9 Wheat] 78 [18241], Chief Justice John Marshall held that a case satisfies Article III's arising under requirement whenever federal law, quote: forms an ingredient of the original cause — end-of-the-quote. In applying this rule,

the Court held that Congress may constitutionally create federal Court jurisdiction whenever a federal law is a **potential ingredient** of a case.

The Federal Court Has Broad Discretion with the Ordering of the Consolidation.

A court has broad discretion in determining whether consolidation is practical. *Atlantic States Legal Foundation Inc. v Koch Refining Co.*, 681 F. Supp 609, 615 (D. Minn. 1988). In exercising this discretion, a court weigh the time and effort consolidation would save with any inconvenience or delay it would cause. *Hendrix v Raybestos-Manhattan, Inc.*, 776 F.2d 1492, 1495 (11th Cir. 1985); *Huene v United States*, 743 F.2d 703, 704 (9th Cir. 1984). See also *Kramer v. Boeing Co.*, 134 F.R.D. 256 (D. Minn. 1991) Consolidation offers efficiency and convenience for this case. Consolidation will result in one trial, which will bind all plaintiffs and defendants. This will save time and avoid unnecessary costs. For the mentioned circumstances, the Federal Court jurisdiction is well founded.

Respectfully,

February 08, 2021

By:

Christina Kamalam

Christina-Kamalam of the Dawson-family

February 08, 2021

By:

Alex - Singarayan

Alex-Singarayan of the Royappa-family

February 08, 2021

By:

Daniel-Andrew

Daniel-Andrew of the Royappa-family

Joint Statements on the Oath of Christina-Kamalam, Alex-Singarayan, and Daniel-Andrew

1. We are over the age of 18 years, and we are the parties of this case. We have personal knowledge of the facts stated with this answer and this Statement on the Oath. If we are called as witnesses, we could and would testify competently to the truth of the facts as stated herein.

2. We make this Joint Statement on the Oath under penalty of perjury that the foregoing is true and correct.

3. We executed this Joint Statement on the Oath on February 08, 2021 at Sunnyvale, California.

By: *Christina - Kamalam*
Christina-Kamalam of the Dawson-family

By: *Alex - Singarayan*
Alex-Singarayan of the Royappa-family

By: *Daniel-Andrew*
Daniel-Andrew of the Royappa-family

Proof of Service

I am domiciled at California and over the age of eighteen years. I am not a party to the within action. My business location for the purposes of this service is P.O. Box 823, Millbrae, California. On February 08, 2021 I served the following documents by U.S.P.S. First Class Mail®:

1. Notice of the Moving and Removal of the Above-Entitled State Case to the United States District Court for the Northern District of California

2. This Proof of Service.

The name and address of the served party is:

Todd Rothbard, Steve Naumchik, Ryan Mayberry, Brian Skarbek, and Christina Dabis
c/o The Law Offices of Todd Rothbard
100 Saratoga Avenue, Suite 200
Santa Clara, California [95051]

1
2 I make this Statement on the Oath under penalty of perjury that the foregoing is true and
3 correct.
4

5 February 08, 2021 By: *Edward-Leopold*
6 Edward-Leopold of the Novak-family.
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28